U.S. DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

2024 MAR 22 A 9:03 4/1/2024 Cange D

EDWARD CALLAHAM,

Plaintiff,

vs.

PASSAIC COUNTY ET. AL,

Defendants,

Case No.:2:24-cv-00891-MCA-JRA

Hon. Madeline Cox Arleo, U.S.D.J. Hon. Jose R. Almonte, U.S.M.J.

AFFIRMATION IN SUPPORT OF REQUEST FOR CERTIFICATE OF DEFAULT

Edward Callaham hereby declares as follows:

- 1. I am the plaintiff in this action.
- This action was commenced pursuant to ADA Title II and 42 U.S.C. § 1983, 42 U.S.C. § 12131-12134, Section 504 of Rehabilitation Act, 29 U.S.C. § 794, 42 U.S.C. § 12132, 28 C.F.R. § 35.130 (d), 29 U.S.C. § 795, 45 C.F.R. § 84.4, NJLAD, 28 C.F.R. § 35.104, 28 C.F.R. Part 35, 42 C.F.R. § 12131(1)
- The time for defendant(s) New Jersey Department of Human Services Title IV-D, to answer or otherwise move with respect to the amended complaint served on March 15, 2024 herein has expired on March 29, 2024.
- 4. Defendant, New Jersey Department of Human Services Title IV-D, has not answered or otherwise moved with respect to the complaint, and the time for defendant New Jersey

Department of Human Services Title IV-D, to answer or otherwise move has not been

extended.

5. That defendant, New Jersey Department of Human Services, is not an infant or

incompetent. Defendant, New Jersey Department of Human Services Title IV-D, is not

presently in the military service of the United States as appears from the facts in this

litigation.

6. Defendant, New Jersey Department of Human Services Title IV-D, is indebted to plaintiff,

Edward Callaham, in the following manner in the sum of \$34,000,000 [thirty four million

dollars] as a portioned of the one hundred million dollars owed by the collective Defendants.

WHEREFORE, plaintiff EDWARD CALLAHAM requests that the default of defendant

New Jersey Department of Human Services Title IV-D, be noted and a certificate of default

issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my

knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part

there of has been paid.

Dated: April 1, 2024

EDWARD CALLAHAM Pro Se

P.O. Box 7131

Rochelle Park, NJ 07662

callahamcourt@gmail.com

Case 2:24-cv-00891-MCA-JRA Document 15-2 Filed 04/01/24 Page 3 of 6 PageID: 234

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

EDWARD CALLAHAM, Plaintiff

V.

SUMMONS IN A CIVIL CASE

PASSAIC COUNTY, ET AL., Defendant

CASE

NUMBER: 2:24-CV-00891-MCA-JRA

TO: (Name and address of Defendant):

New Jersey Department of Human Services Title IV-D Division of Family Development (TANF)

Office of Assistant Commissioner - Natasha Johnson 6 Quakerbridge Plaza Trenton, NJ 08619

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States Agency, or an office or employee of the United States described in Fed. R. civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

EDWARD CALLAHAM P.O. BOX 7131 ROCHELLE PARK NJ 07662

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

U.S. DISTRICT COURT CLERKS OFFICE 50 Walnut Street Newark, NJ 07102

CLERK OF COURT

U.S. DISTRICT OF TO A TOTAL TOWN



ISSUED ON 2024-02-16 13:25:52, Clerk USDC NJD

2 24 CV 00891 MCA JRA

COMMENT:

			202	40301094628
AO 440 (Rev. 06/12) Sur	nmons in a Civil Action	RETURN OF SE	RVICE	
SERVICE OF: EFFECTED (1) BY ME: TITLE:	SUMMONS AND COMPLAIN DAVID FILARSKI PROCESS SERVER		DATE: 3/1/2024 10:30:22 AM	
CHECK ONE BOX BELO	DW TO INDICATE APPROPRI	ATE METHOD OF SERV	ICE:	
[] Served personally up	on the defendant			
NEW JERSEY DEPART	MENT OF HUMAN RESOURC	CES TITLE IV-D		
Place where served:				
DIVISION OF FAMILY D TRENTON NJ 08619	EVELOPMENT, OFFICE OF	ASSISTANT COMMISSIC	NER - NATASHA JOHNSON 6 QU	JAKERBRIDGE PLAZA
	at the defendant's dwelling how with whom the summons and		vith a person of suitable age and dis	scretion then residing
V MILLENER				
Relationship to defendar	nt PERSON AUTHORIZED	TO ACCEPT SERVICE		
Description of Person Ad	ccepting Service:			
SEX: <u>F</u> AGE: <u>51-65</u>	HEIGHT: <u>5'4"-5'8"</u> WEIGH	HT: <u>131-160 LBS.</u> SK	IN:BROWN HAIR:BLONDE	OTHER:
[X] To the pest of my kn	owledge, said person was not	STATEMENT OF SER		
TRAVEL\$	nar	SERVICES \$	TOTAL \$_	The state of the s
		DECLARATION OF SE	ERVER	
l declare unde		ervice and Statement of S	of America that the foregoing inform server is true and correct.	ation contained in
Served Data:	a thia	MARY A TORREST	i, <u>DAVID FILARSKI,</u>	
Subscribed and Sworn to me this 1st day of March, 2024		String Commission Commission	was at the time of service a compete not having direct interest in the litigat	ion. I declare under penalty of
		CZ NOTARY & U	perjury that the foregoing is true and	correct.
Notary Signature		O PUBLIC		
Rosemery Ramos Name of Notary	September 25th, 2028 My Commission Expires	OF NEW STATE	Signature of Process Server	03/01/2024 Date
PLAINTIFF: EDW DEFENDANT: PASS VENUE: DIST	ARD CALLAHAM, PRO-SE ARD CALLAHAM SAIC COUNTY, ET AL RICT CV 00891 MCA JRA			

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

EDWARD CALLAHAM, *Plaintiff*,

AFFIRMATION OF SERVICE

V.

PASSAIC COUNTY, ET AL., Defendant

CASE

NUMBER: 2:24-CV-00891-MCA-JRA

I EDWARD CALLAHAM declare under penalty of perjury that I have served a copy of the attached AMENDED COMPLAINT upon Defendant NJ DEPARTMENT OF HUMAN SERVICE TITLE IV-D by certified mail.

CERTIFIED MAIL®



7022 2410 0002 9712 6870

To:

NJ DEPARTMENT OF HUMAN SERVICE TITLE IV-D OFFICE OF ASSITANT COMMISSIONER - NATASHA JOHNSON 6 QUAKERBRIDGE PLAZA TRENTON, NJ 08619

Dated: March 11, 2024

EDWARD CALLAHAM Pro Se

P.O. Box 7131

Rochelle Park, NJ 07662 callahamcourt@gmail.com

SENDER: COMPLETE THIS SECTION J. Complete items 1, 2, and 3. C. P. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: NEW JERSEY DEPARTMENT OF HUMAN SERVICE OF ASSISTANT COMMISSIONER—NATASHA JOHNSON	A. Signature Agent Address B. Redeived by (Printed Name) C. Date of Delive D. is delivery address different from item 1? Yes If YES, enter delivery address below: No
6 QUAKERBRIDGE PLAZA TRENTON NJ 08619	
9590 9402 7587 2098 1917 08 2. Article Number (Transfer from service label) 7022 2410 0002 9712 6870	3. Service Type □ Adult Signature □ Adult Signature Restricted Delivery ■ Certified Mail® □ Collect on Delivery □ Collect on Delivery □ Insured Mail Restricted Delivery (over \$500) □ Priority Mail Express® □ Registered Mail™ □ Registered Mail Restricted Delivery □ Signature Confirmation □ Signature Confirmation □ Restricted Delivery □ Restricted Delivery
PS Form 3811, July 2020 PSN 7530-02-000-9053	Domestic Return Receiv